

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**GENWORTH LIFE AND ANNUITY  
INSURANCE COMPANY (f/k/a FIRST  
COLONY LIFE INSURANCE COMPANY),**

**Plaintiff,**

**vs.**

**DOROTHY CIURA and  
LISA VANDENBERGHE (n/k/a LISA ORTEGA),**

**Defendants.**

**No. 07 C 6400**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on the **13<sup>th</sup>** day of **March, 2008**, at **9:00 a.m.**, or as soon after as this motion may be heard, we will appear before the Honorable Judge Der-Yeghiayan or any judge sitting in his/her place or stead, in the courtroom usually occupied by him/her in **Room 1903** in the United States District Court for the Northern District of Illinois, Eastern Division, and then and there present Genworth Life and Annuity Insurance Company's Motion for Entry of Default Against Dorothy Ciura, a true and correct copy of which is attached hereto and hereby served upon you.

Dated at Chicago, Illinois this **10<sup>th</sup>** day of **March, 2008**

Respectfully submitted,

**GENWORTH LIFE AND ANNUITY  
INSURANCE COMPANY**

By: /s/ Stuart F. Primack

One of its Attorneys

William A. Chittenden, III  
Stuart F. Primack  
CHITTENDEN, MURDAY & NOVOTNY LLC  
303 West Madison Street, Suite 1400  
Chicago, Illinois 60606  
(312) 281-3600

*Certificate of Service*

I hereby certify that on **March 10, 2008**, I caused to be filed with the Clerk of the U.S. District Court, Northern District of Illinois, Eastern Division, **Genworth Life and Annuity Insurance Company's Motion for Entry of Default Against Dorothy Ciura** via electronic filing, and via facsimile and regular mail to:

Craig H. Greenwood  
Attorney at Law  
4456 Seeley Avenue  
Downers Grove, IL 60515

/s/ Stuart F. Primack  
Stuart F. Primack  
CHITTENDEN, MURDAY & NOVOTNY LLC  
303 West Madison Street, Suite 1400  
Chicago, Illinois 60606  
(312) 281-3600  
(312) 281-3678 (fax)  
[sprimack@cmn-law.com](mailto:sprimack@cmn-law.com)